S/N 10/727,240   Response to Office Action Dated 02/09/2007

REMARKS

A review of the claims indicates that:

A)   Claim 18 remains in original form.

B)   Claims 1—17, 19—28 and 32—34 are previously presented.

C)   Claims 29—31 are withdrawn.

In view of the following remarks, Applicant respectfully requests reconsideration of the rejected claims and withdrawal of the rejections.

§103 Rejections

The independent claims 1, 14, 21, 25, 32 and 33 were rejected under Section 103(a) as being unpatentable over Gebert (US 2002/0111963) in view of PODI (a web-based document). The Applicant respectfully traverses the rejection.

Traversal of Rejection of Independent Claim 1

Claim 1 recites a processor-readable medium comprising processor-executable instructions for generating a PDF (portable document format) document **from a PPML (personalized print markup language) document**, the processor-executable instructions comprising instructions for:

- parsing structures within the PPML document;
- generating a PDF document tree;
- interpreting the parsed structures from the PPML document onto locations on the PDF document tree; and
- configuring a PDF document according to the PDF document tree.

The PODI document fails to teach or suggest PPML to PDF translation. Instead, PODI teaches that a PPML document can be reconfigured so that its assets are in PDF format. For example, a PPML document having JPEG and other assets would become a PPML document having PDF assets. However, the

1   document would still remain a PPML document. Thus, PODI does not teach or

2   suggest PPML to PDF translation.

3   The PODI document teaches a product called "Argon PPML/PDF" (see

4   logo in the upper left corner, all slides). Accordingly, PODI teaches the creation

5   of a PPML/PDF document. Such a document is a PPML document wherein all of

6   the assets have been converted to PDF (see slides 25—27 particularly). Thus,

7   assets, such as images in other formats, are all translated to PDF, for inclusion

8   within the PPML/PDF document.

9   Referring to PODI at "1" in slide 26, we see that PPML having exclusive

10   use of PDF is such that "data representation in PPML is limited to integral PDF

11   files." Thus, what PODI teaches is a PPML document having PDF assets within

12   its tree structure. Accordingly, PODI does not teach or suggest translating from

13   PPML to PDF. PODI teaches translating a PPML document having many

14   different asset types into a PPML document having PDF assets. Accordingly,

15   PODI is deficient to support the Section 103 rejection. The Applicant respectfully

16   requests that Claim 1 be allowed to issue.

17   The Gebert reference fails to disclose PPML to PDF translation. Instead,

18   Gebert discloses a printing system that receives an XML source document as input

19   and creates a plurality of page objects that are rasterized and printed (see FIG . 1

20   and other locations). Additionally, XML to PDF translation is disclosed (see

21   [0007] lines 5—9). However, nothing in Gerbert teaches or suggests PPML to

22   PDF translation. In fact, the Patent Office agrees that Gebert does not teach

23   PPML to PDF translation (see Office Action mailed 02/09/2007, at the bottom of

24   page 3).

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<u>Even when combined, Gebert and PODI fail to teach or suggest the elements of PPML to PDF translation.</u> Gebert teaches XML to PDF translation, while PODI teaches translating a PPML document having assets of different types into a PPML document having only PDF assets. Therefore, even when combined the references of record fail to teach or suggest the elements recited by Claim 1. Accordingly, the Applicant respectfully requests that the Section 103 rejection be removed, and the claims allowed to issue.

<u>XML to PDF translation does not teach or suggest PPML to PDF translation.</u> The Patent Office suggests that XML to PDF translation is equivalent to PPML to PDF translation (see page 3, OA mailed 02/09/07). The implication is apparently that XML to PDF translation suggests PPML to PDF translation. In particular, the Patent Office suggests that, "thus, generating a PDF document from an PPML document is interpreted as requiring the same functionalities as generating a PDF from XML." (See Office Action at page 5, first full paragraph.) The Applicant respectfully disagrees.

In fact, PPML is a language adapted for use with variables and XML is not so adapted. Thus, the Office's suggestion that a PPML to PDF translation would require "the same functionalities as generating a PDF from XML" is logically suspect. That is, two different languages, PPML and XML, could be expected to require two different translators to result in PDF. In particular, nothing in XML's makeup suggests PPML's variable handling ability.

<u>In fact, use of PPML teaches away from contemporaneous use of PDF.</u> PPML teaches the use of variables, and therefore a constantly changing output.

For example, the name and address of a letter could be a variable, and the body of the letter could remain the same. Thousands of letters, each with a different name and address, could be printed using PPML. In contrast, PDF is frequently used because the author of a document can effectively "lock" the document so that it cannot be changed, at least without resorting to tools to which many people do not have ready access. Thus, translation from PPML to PDF is not suggested by the prior art, which does not reconcile this fact.

The Applicant submits that there is no reference of record that teaches or suggests PPML translation to PDF. The prior art of record teaches only that XML can be translated to PDF. Accordingly, the Applicant submits that the Office should either find a reference—teaching PPML to PFD translation—or should supply such an affidavit indicating that it is obvious that the translation is suggested by the XML to PDF translation shown in the prior art. In the absence of such an affidavit or new art showing PPML to PDF translation, the Applicant respectfully requests that the Section 103 rejection be removed, and the claims allowed to issue.

Traversal of Rejection of Independent Claims 14, 21, 25, 32 and 33

Claims 14, 21, 25, 32 and 33 recite PPML to PDF translation generally, and specifically recite generation of a PDF document tree. Accordingly, these claims are allowable for at least the same reasons that Claim 1 is allowable.

Traversal of Rejection of Dependent Claims

Claims 2—13, 15—20, 22—24, 26—31 and 34 depend from Claims 1, 14, 21, 25, 32 and 33. These claims are allowable due to their dependence from an allowable base claim. These claims are also allowable for their own recited

features that, in combination with those recited in the associated independent claim, are neither disclosed nor suggested in references of record, either singly or in combination with one another.

Conclusion

The Applicant submits that the claims as presented are in condition for allowance. Accordingly, the Applicant respectfully requests that a Notice of Allowability be issued. If the Patent Office's next anticipated action is not the issuance of a Notice of Allowability, the Applicant respectfully requests that the undersigned attorney be contacted to schedule an interview.

Respectfully Submitted,

Dated: 09 April 2007   By: David S. Thompson
                            Reg. No. 37,954
                            Attorney for Applicant

                            LEE & HAYES PLLC
                            Suite 500
                            421 W. Riverside Avenue
                            Spokane, Washington 99201
                            Telephone: 509-324-9256 x235
                            Facsimile: (509) 323-8979

LEE & HAYES, PLLC   17